

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA**

IN RE:

Mitchelle L Kennedy

CASE NO: 21-02009-hb

CHAPTER: 13

Debtor(s).

ANSWER TO MOTION FOR RELIEF FROM STAY

The Debtor(s) in this matter, by and through their undersigned counsel, answers the Motion of U.S. Bank National Association (as successor-in-interest to Bank of America, N.A., as successor by merger to LaSalle Bank National Association), as trustee, on behalf of the holders of the GSAMP Trust, (hereinafter referred to as "Movant") as follows:

1. Debtors deny all the allegations contained in Movant's Motion unless specifically admitted hereafter.
2. Debtors are informed and believe that Movant is adequately protected pursuant to the terms of the confirmed Chapter 13 Plan and should not be entitled to relief from the automatic stay.

WHEREFORE, the Debtor prays that the Motion be dismissed, that they be reimbursed their costs and attorney's fees associated with the defense of this Motion, and for such other and further relief as this Court may deem just and proper.

Respectfully submitted.

Moss & Associates, P.A.

By: /s/ Christopher M. Edwards
Christopher M. Edwards
Federal I.D. No. 9193
1900 Laurens Road
Greenville, SC 29607
(864) 272-3413
Attorney for the Debtor

Greenville, South Carolina
December 9, 2021

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Certification of Facts

In the above-entitled proceeding in which relief is sought by U.S. Bank National Association (as successor-in-interest to Bank of America, N.A., as successor by merger to LaSalle Bank National Association), as trustee, on behalf of the holders of the GSAMP Trust from the automatic stay provided by 11 U.S.C. § 362, I do hereby certify to the best of my knowledge the following:

1. Nature of Movant's Interest: Movant has a perfected security interest in the below referenced property.
2. Brief Description of Security Agreement or Authority under which Interest Arises:
See Note and Mortgage Attached to Movant's Motion.
3. Description of Property Encumbered by Stay:
423 Savanna Plains Drive Spartanburg, SC 29307
4. Basis for Relief: None. Movant is adequately protected under the terms of the Chapter 13 Plan.
5. Valuation of Property:

Fair Market Value	\$	260,000.00	
Liens (mortgages)	\$	219,819.00	
Net Equity			\$40,181.00
6. Amount of Debtors' Estimated Equity: \$40,181.00

Moss & Associates, Attorneys P.A.

/s/ Christopher M. Edwards

Christopher M. Edwards, Fed. I.D. 9193

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Greenville, SC 29607

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CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that on today's date, I served, on the persons and addresses below, Electronically or by First Class Mail, postage prepaid, Debtors' Answer to Motion for Relief of Stay and Debtors' Certification of Facts.

Brian Yoho
Rogers Townsend, LLC
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Columbia, SC 29201
Attorney for Movant

Gretchen D. Holland
Chapter 13 Trustee
20 Roper Corners Circle
Suite C
Greenville, SC 29615
(submitted electronically)

Moss & Associates, P.A.

By: /s/Kayla T. Suber
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Greenville, South Carolina
December 9, 2021